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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE WILLIAM Q. HAYES)

UNITED STATES OF AMERICA, Plaintiff, v. RAMON ESPERANZA CARRILLO, Defendant.	Case No. 08CR1446-WQH DATE: September 8, 2008 TIME: 2:00 p.m. NOTICE OF MOTIONS *IN LIMINE* AND MOTIONS *IN LIMINE* TO: (1) PRECLUDE 404(b) AND 609 EVIDENCE; (2) PRECLUDE DEPORTATION DOCUMENTS AS EVIDENCE OF ALIENAGE; (3) COMPEL INSPECTION OF CERTIFIED DOCUMENTS PRE-TRIAL; (4) PRECLUDE THE "A-FILE CUSTODIAN" FROM TESTIFYING ABOUT IMMIGRATION PROCEEDINGS; (5) PRECLUDE THE "A-FILE CUSTODIAN" FROM TESTIFYING ABOUT DATABASE SEARCHES; (6) ALLOW IMPEACHMENT OF ALL HEARSAY DECLARANTS; AND (7) GRANT LEAVE TO FILE FURTHER MOTIONS.

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
STEVE STONE, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on September 8, 2008, at 2:00 p.m. or as soon thereafter as counsel may be heard, the defendant, Ramon Esperanza Carrillo, by and through his counsel, Robert R. Henssler, Jr. and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

MOTIONS

Ramon Esperanza Carrillo, the accused in this case, by and through his attorneys, Robert R. Henssler, Jr., and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an Order:

1) Preclude 404(b) and 609 Evidence;
2) Preclude Deportation Documents as Evidence of Alienage;
3) Compel Inspection of Certified Documents Pre-trial;
4) Preclude the "A-file Custodian" from Testifying about Immigration Proceedings;
5) Preclude the "A-file Custodian" from Testifying about Database Searches;
6) Allow Impeachment of All Hearsay Declarants; and
7) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

Dated: August 25, 2008

/s/ Robert R. Henssler, Jr.
ROBERT R. HENSSLER JR.
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Ramon Esperanza Carrillo

CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

Steve Stone
U S Attorneys Office Southern District of California
Email: Steve.Stone@usdoj.gov

DATED: August 25, 2008

/s/ Robert R. Henssler, Jr.
ROBERT R. HENSSLER, JR.
Federal Defenders of San Diego, Inc.
Robert_Henssler@fd.org